

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	Case No. 24-cr-40016-MRG
BRUCE W. SPINNEY, III)	
)	
Defendant.		

ASSENTED TO MOTION FOR PROTECTIVE ORDER

The United States respectfully moves this Court, with the assent of the defendant's counsel of record, for a protective order pursuant to Federal Rule of Criminal Procedure 16(d) and Local Rule 116.6(b). In support, the government submits as follows:

1. The defendant, BRUCE W. SPINNEY, III ("the defendant"), made his initial appearance and was arraigned on the indictment on June 6, 2024. The indictment charges the defendant with three counts of wire fraud, in violation of 18 U.S.C. § 1343, and one count of conducting an unlawful monetary transaction, in violation of 18 U.S.C. § 1957.

2. At the initial appearance on June 6, 2024, U.S. Magistrate Judge David H. Hennessy ordered the completion of Automatic Discovery under L.R. 116.1(c) and for the disclosure of exculpatory evidence under L.R. 116.2(b)(1) by June 21, 2024.

3. The discovery that the government has produced includes large amounts of bank and other financial records not only of the defendant, but of other third parties, including the personal identifiable information ("PII"). Instead of redacting thousands of pages of bank records, the defendant's counsel of record have agreed to the terms of the attached protective order which limits the use and disclosure of the discovery in this case for the defense of this criminal case, and not any other purpose. The order furthermore permits the parties to seek

modification of the order if it becomes necessary.

4. Accordingly, the government respectfully moves this court to enter the attached proposed protective order which has been signed and agreed upon by the parties.

Respectfully submitted,

JOSHUA S. LEVY
Acting U.S. Attorney

ALLOWED David H. Hennessy U.S.M.J.
Jun 21, 2024

/s/ Neil Gallagher
Neil J. Gallagher, Jr.
Assistant U.S. Attorney

Date Submitted: June 21, 2024

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By: Neil Gallagher
Neil Gallagher
Assistant U.S. Attorney